

EXHIBIT 7

FILED UNDER SEAL

Page 1

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MINNESOTA

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4 CASE NUMBER: 16-cv-1054 (WMW/DTS)

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6 Fair Isaac Corporation, a Delaware corporation,

7 Plaintiff,

8 versus

9 Federal Insurance Company, and Indiana
corporation, and ACE American Insurance Company, a
10 Pennsylvania corporation,

11 Defendants.

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14 VIDEOTAPED DEPOSITION OF FEDERAL RULE OF CIVIL
15 PROCEDURE 30(b) (6) FEDERAL INSURANCE COMPANY and
16 ACE AMERICAN INSURANCE COMPANY WITNESS DESIGNEE

17
18 RAMESH PANDEY

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25 TAKEN: 26 November 2019 BY: Jackie McKone

<p>1 under oath as follows.</p> <p>2 * * *</p> <p>3 EXAMINATION</p> <p>4 BY MR. HINDERAKER:</p> <p>5 Q. Good morning. We met, we commented in the hallway 6 about our -- the frequency of our interactions 7 here in --</p> <p>8 A. Many times.</p> <p>9 Q. So I know that we've done, you know, you and I 10 have -- you have sat for examination now this will 11 be the third time in this lawsuit, and did you 12 meet with counsel to prepare for the deposition 13 today?</p> <p>14 A. Yup.</p> <p>15 Q. It would be helpful I think sir if when you're 16 answering try to speak up a bit.</p> <p>17 A. Yes.</p> <p>18 Q. And of course, having a verbal answer rather than 19 a nod or a gesture. So how long did you -- how 20 long did you prepare for today's deposition?</p> <p>21 A. Yesterday and today also. So two days.</p> <p>22 Q. How many hours would you say?</p> <p>23 A. Few hours yesterday, was a good long day. I came 24 early so it was a long time.</p> <p>25 Q. I'm sorry. What?</p>	<p>Page 6</p> <p>1 (Whereupon a short break was taken from 2 9:30 a.m. to 9:33 a.m.) 0</p> <p>3 THE VIDEOGRAPHER: We are back on the 4 record. The time now is 9:32 a.m.</p> <p>5 BY MR. HINDERAKER:</p> <p>6 Q. So about five months ago, you had a new role 7 integration architect, ICC?</p> <p>8 A. Yes.</p> <p>9 Q. And previous to that, you were?</p> <p>10 A. Chief architect for North America.</p> <p>11 Q. For how long did you have that role?</p> <p>12 A. Four years.</p> <p>13 Q. So beginning in about 1915 -- 2015?</p> <p>14 A. Yes.</p> <p>15 Q. Then before being chief architect of North 16 America, what role was your role?</p> <p>17 A. Chief architect for Chubb, the original Chubb, 18 Legacy Chubb.</p> <p>19 Q. What was the -- when you were chief architect for 20 Legacy Chubb, what was the geographic scope of 21 that responsibility?</p> <p>22 A. North America. Mainly US, Canada. US and Canada.</p> <p>23 Q. Okay. So all right, and for how long did you have 24 that role?</p> <p>25 A. Less than two years.</p>
<p>Page 7</p> <p>1 A. Yesterday almost all day.</p> <p>2 Q. I have to get my ear tuned to you. Well, I'm not 3 going to go through all of the things that we've 4 done in the past but only to -- only to say if I 5 ask a question that isn't clear to you or you do 6 not understand --</p> <p>7 A. Okay.</p> <p>8 Q. -- please let me know.</p> <p>9 A. Sure.</p> <p>10 Q. Okay. I recall -- well, rather than me recall, 11 your job title is what please?</p> <p>12 A. Now I'm the head of the integration architect and 13 ICC delivery center.</p> <p>14 Q. So I understood integration architect?</p> <p>15 A. Integration delivery centers -- integration center 16 of competency. I lead that group.</p> <p>17 Q. When did you assume that role?</p> <p>18 A. About five months back. So I was the chief 19 architect for North America. Now I took the ICC 20 delivery also.</p> <p>21 MS. JANUS: One moment. Did something 22 happen so that someone called in? We have a live 23 video --</p> <p>24 THE VIDEOGRAPHER: We're going off the 25 record. The time is 9:30. 0</p>	<p>Page 9</p> <p>1 Q. Have you -- going to the current time, integration 2 architect, what's the geographic scope of that 3 responsibility?</p> <p>4 A. That's the North America mainly from architecture 5 point of view, but the ICC delivery is global.</p> <p>6 Q. Then before chief architect for Legacy Chubb, you 7 were --</p> <p>8 A. I was with Citibank.</p> <p>9 Q. This has been marked as Exhibit 527, and when was 10 first time you saw this?</p> <p>11 A. Couple of weeks back, few weeks back.</p> <p>12 Q. Did you have any role in the preparation of 13 Exhibit 527?</p> <p>14 A. Yes.</p> <p>15 Q. What was it?</p> <p>16 A. So I collected all the -- I reached out to all the 17 team leads, architects, and different team members 18 to find the information so that I can put the 19 dates and version for the delete, the records, and 20 also which data center they were deployed and 21 everything. So all of it associated with this I 22 did it.</p> <p>23 Q. So let me just -- let me back up. So what I heard 24 you say is you reached out to the persons in the 25 different locations who had responsibility.</p>

<p>1 A. Yes.</p> <p>2 Q. Okay. Did you yourself gather any of the 3 underlying documents that had the responsive 4 information?</p> <p>5 A. Yes. Working with those teams, let's say for 6 Europe, working with Mike Hutchinson and his team, 7 working with Canada, that team. So yes. I -- 8 they were gathering, but I was talking to all of 9 them. Mostly.</p> <p>10 Q. So let me just go country by country and 11 understand the liaisons that you worked with. So 12 Canada; with whom did you work?</p> <p>13 A. Silverio Miranda, he's the chief architect for 14 Canada. Zorica --</p> <p>15 Q. I can't go that fast. Can you spell the person's 16 name for Canada?</p> <p>17 A. Silverio, S-I-L-V-E-R-I-O.</p> <p>18 Q. The last name?</p> <p>19 A. Miranda, M-I-R-A-N-D-A.</p> <p>20 Q. All right. Thank you. Then who else in Canada?</p> <p>21 A. Zorica, Z for zebra, O-R-I-C-A, last name 22 Todorovic.</p> <p>23 Q. That would be T-O-D-O-R-O-V-I-C?</p> <p>24 A. Exactly.</p> <p>25 Q. That one I have.</p>	<p>Page 10</p> <p>1 A. Gislanjani (phonetic).</p> <p>2 Q. I thought he was a US guy.</p> <p>3 A. He's responsible for US and UK both, but he lives 4 in the UK, but he's responsible for US.</p> <p>5 Q. So Mike Hutchinson, Claudio. Anybody else that 6 was primarily --</p> <p>7 A. These are the two main.</p> <p>8 Q. All right, and then Australia?</p> <p>9 A. Same; Mike Hutchinson and Claudio.</p> <p>10 Q. All right. So I --</p> <p>11 A. For Australia also Zorica, Zorica Todorovic. She 12 also gives information.</p> <p>13 Q. Zorica? Zorica?</p> <p>14 A. Yes.</p> <p>15 Q. She's a Canadian person as well?</p> <p>16 A. Yes, Canadian, and she also informs about 17 Australia.</p> <p>18 Q. Then anyone else that were the principal people?</p> <p>19 A. That's it.</p> <p>20 Q. So let me run through a series of names that came 21 to me with respect to this deposition, and let me 22 know if you've talked to them?</p> <p>23 A. Okay.</p> <p>24 Q. Tony Zhang?</p> <p>25 A. He's under Silverio. So Silverio must have talked</p>
<p>1 A. Yup.</p> <p>2 Q. Anyone else?</p> <p>3 A. Also I talked to Shailesh Sharma, and a lot of 4 people. These are the teammates.</p> <p>5 Q. Would you spell the third person please?</p> <p>6 A. Shailesh, S-H-A-I-L-E-S-H S-H-A-R-M-A.</p> <p>7 Q. That's the last name?</p> <p>8 A. Yes.</p> <p>9 Q. Say that again?</p> <p>10 A. S-H-A-R-M-A.</p> <p>11 Q. So were they the main people for Canada?</p> <p>12 A. Exactly.</p> <p>13 Q. All right, and then for the UK, for Europe?</p> <p>14 A. It's Mike, Michael Hutchinson.</p> <p>15 Q. Before I ask the next person, do you make a 16 distinction between the UK and Europe, or is that 17 the same --</p> <p>18 A. They are same thing for us. It's Europe joined 19 EUD. It's the same thing.</p> <p>20 Q. So you spoke with -- spoke with Mike Hutchinson, 21 and who else?</p> <p>22 A. And Claudio.</p> <p>23 Q. Okay. Claudio is located in the US?</p> <p>24 A. UK.</p> <p>25 Q. Claudio -- what's Claudio's last name?</p>	<p>Page 11</p> <p>1 to him.</p> <p>2 Q. You don't know that one way or the other?</p> <p>3 A. Well, Silverio talked to his team. He's part of 4 that team.</p> <p>5 Q. I'm just asking whether you spoke with him.</p> <p>6 A. No. Not directly. Through Silverio.</p> <p>7 Q. Henry Mirolyuz?</p> <p>8 A. No. He doesn't work for us anymore.</p> <p>9 Q. Cristian Vasilache?</p> <p>10 A. No.</p> <p>11 Q. Alexander Pavlenko?</p> <p>12 A. Pavelko. Yes. That's Silverio and Alex. Yes.</p> <p>13 Alex report to --</p> <p>14 Q. So they are Canadians, and they would be reporting 15 to Silverio?</p> <p>16 A. Exactly.</p> <p>17 Q. But you did not speak to them --</p> <p>18 A. No. I talked to Alex, but I heard -- Silverio 19 collected all the data for me.</p> <p>20 Q. So you did speak with Alex?</p> <p>21 A. Yeah, but I told her just help Silverio out.</p> <p>22 Q. Lance Martin?</p> <p>23 A. Lance is -- I didn't talk to him. No.</p> <p>24 Q. Richard Johnson?</p> <p>25 A. No.</p>